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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

MARK H. and RIE H.,)	CIVIL NO. CV00-00282 MLR-LEK
Individually and as Guardians)	(Other Civil Action)
Ad Litem of MICHELLE H. and)	
NATALIE H., minors,)	DEFENDANTS MOTION TO PRECLUDE
)	THE TESTIMONY OF BARBARA
Plaintiffs,)	BATEMAN; MEMORANDUM IN SUPPORT
)	OF MOTION; DECLARATION OF GREGG
vs.)	M. USHIRODA; EXHIBITS "A" - "H";
)	CERTIFICATE OF SERVICE
PATRICIA HAMAMOTO, in her)	
official capacity as)	
Superintendent of the Hawaii)	TRIAL DATE: March 16, 2009
Department of Education;)	

DEPARTMENT OF EDUCATION,)	JUDGE: Hon. Manuel L. Real
STATE OF HAWAII;)	
)	
Defendants.)	NO TRIAL DATE
_____)	

**DEFENDANTS MOTION TO PRECLUDE
THE TESTIMONY OF BARBARA BATEMAN**

COME NOW Defendants PATRICIA HAMAMOTO and DEPARTMENT OF EDUCATION ("DOE") (collectively, "Defendants"), by and through their attorneys, WATANABE ING LLP, and hereby move this Honorable Court for an Order Precluding the Testimony of Barbara Bateman.

The Defendants bring this motion in accordance with Rule 7 of the Federal Rules of Civil Procedure and all applicable local rules of practice for the United States District Court for the District of Hawaii, and bases it upon the attached memorandum in support of their motion and the entire record and files herein.

DATED: Honolulu, Hawaii, July 28, 2008.

/s/ Gregg M. Ushiroda
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